

## Remarks

The claims have been rejected with primary reliance being had on US 2002/0112041 (Bennett). Bennett discloses techniques for facilitating communication among a plurality of different telecommunication systems through interworking and connectivity between different network standards by means of a central server. The central server is arranged to receive messages from Short Message Service Centres (SMSCs) which provide message store and forward functions for the attached mobile networks. Such messages will be in what is known as mobile terminated (MT) format.

This contrasts with the architecture of a telecommunication services apparatus wherein the apparatus supporting the execution of the messaging applications is located in the mobile originating (MO) path of the message routing, i.e. before any of the SMSCs providing message store and forward functions (e.g. see Figures 1 to 3).

Claims 1 and 21 have been amended to clarify this difference between the claimed apparatus and method and that which is disclosed by Bennett. The messages are received in a mobile originated (MO) format (i.e. they are messages that have not previously passed through an SMSC providing a store-and-forward function for the network). Claims 13 and 33 have been amended in view of the amendments made to claims 1 and 21, respectively.

Accordingly, the subject matter of claims 1 and 21 is not disclosed by Bennett. In addition, it would not have been obvious to one of ordinary skill in the art to modify Bennett in a manner that would yield the subject matter of claims 1 and 21, since a fundamental aspect of Bennett is the location of the central server after the SMSCs in the message path (i.e. not in the MO path). The purpose of the central server in Bennett is to provide unification of the different standards used by different SMSCs (see paragraph 0051). Accordingly, it would not have been obvious to place the central server of Bennett in the MO path of the message routing because this would prevent Bennett from performing its intended function – namely to improve connectivity between the outputs of SMSCs using different standards.

The other applied references do not overcome the fundamental deficiencies of Bennett as a teaching reference vis-a-vis the subject matter of claims 1 and 21, and therefore the rejections of claims 1 and 21 should be withdrawn, as should the rejections of the remaining claims for at least the reason they depend from claims 1 and 21.

Regarding any contentions of the Examiner not expressly discussed herein, the absence of any discussion or specific traversal should not be construed as an acquiescence in those contentions. Rather, no comment is necessary given that the claims are allowable for at least the reasons set forth herein.

In view of the foregoing, request is made for timely issuance of a notice of allowance.

Respectfully submitted,

RENNER, OTTO, BOISSELLE & SKLAR, LLP

/Don W. Bulson/

By \_\_\_\_\_  
Don W. Bulson, Reg. No. 28,192

1621 Euclid Avenue  
Nineteenth Floor  
Cleveland, Ohio 44115  
(216) 621-1113

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